

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

Plaintiffs Nathan Roberts and Freedom Truck Dispatch LLC (collectively, “Plaintiffs”) and Defendants Progressive Insurance Company, Progressive Casualty Insurance Company, and Circular Board Inc.<sup>1</sup> (collectively, “Defendants”) have jointly agreed to a schedule (subject to this Court’s approval) for briefing Defendants’ motions to dismiss Plaintiffs’ Class-Action Complaint (“Complaint”) [Doc. 1], in which Plaintiffs allege that Defendants violated a federal civil rights statute, 42 U.S.C. § 1981, in connection with a grant program for Black-owned small businesses. Plaintiffs have not yet served the Complaint, and Defendants have agreed to waive formal service as part of the parties’ agreement to the following deadlines:

- Defendants' Motions to Dismiss and Memoranda in Support: **December 13, 2023**
- Plaintiffs' Opposition(s): **February 14, 2024**
- Defendants' Replies: **March 15, 2024**

This agreed briefing schedule will allow the parties sufficient time to brief the legal issues raised by the Complaint, will streamline briefing for the multiple parties in this action, will not unduly delay this case, and will avoid costs associated with formal service of process. The parties

<sup>1</sup> The Complaint names “Circular Board LLC” as a Defendant, but the correct name of the entity is Circular Board Inc.

therefore respectfully request that the Court approve this Joint Stipulation and enter the agreed briefing schedule.

Respectfully submitted,

/s/ Julie Byrne (per consent)

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of September, 2023, a copy of this Joint Stipulation to Answer or Otherwise Move was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*/s/ Halden R. Schwallie*  
One of the Attorneys for Defendant  
Circular Board LLC